MEMO ENDORSED

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May 19, 2021

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## BY ECF AND EMAIL

The Honorable Andrew L. Carter, Jr. United States District Judge United States Courthouse 40 Foley Square, Room 435 New York, New York 10007

**USDC SDNY** DOCUMENT ELECTRONICALLY **FILED** DOC#:

DATE FILED: 5 - 20 - 21

United States v. Robert Alexander, 19 Cr. 164 (ALC) Re:

Dear Judge Carter:

On behalf of Robert Alexander, I respectfully submit this letter to request that Mr. Alexander be permitted to travel to the following locations, on the dates specified, for three upcoming trips: (a) to Los Angeles, California from May 23 through May 27, 2021; (b) to New Orleans, Louisiana, Gulfport, Mississippi, Tampa, Florida, and Miami, Florida from May 30 through June 8, 2021; and (c) to Las Vegas, Nevada and Los Angeles, California from June 24 through July 1, 2021. The Government and the Pretrial Services Office for the Southern District of New York do not object to this request. The conditions of Mr. Alexander's pretrial release currently restrict his travel to the Southern District of New York, the Eastern District of New York, and the District of New Jersey.

Mr. Alexander intends to fly to Los Angeles on May 23, 2021 to meet with his eye doctor for his keratoconus (an eye disease), attend meetings relating to a potential business opportunity, and meet with various individuals in connection with preparing his defense in SEC v. Alexander, 19-CV-1161 (JPC). Mr. Alexander will be accompanied by Peter Gleason, his counsel in SEC v. Alexander, during all meetings in Los Angeles in connection with Mr. Alexander's business opportunity and preparation of his defense in SEC v. Alexander. Accordingly, Mr. Alexander needs permission to travel to the Central District of California during the period from May 23 through May 27, 2021.

Additionally, Mr. Alexander intends to fly to New Orleans on May 30, 2021 to meet with various individuals in connection with preparing his defense in SEC v. Alexander. Mr.

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Alexander also plans to drive from New Orleans to Gulfport, Mississippi on May 31, 2021 to meet with other individuals in connection with preparing his defense in *SEC v. Alexander*. Mr. Alexander then intends to fly from New Orleans to Tampa on June 1, 2021 to attend meetings relating to a potential business opportunity and meet with other individuals in connection with preparing his defense in *SEC v. Alexander*. Next, Mr. Alexander plans to drive from Tampa to Miami on June 4, 2021 to attend meetings relating to a potential business opportunity and meet with other individuals in connection with preparing his defense in *SEC v. Alexander*. Mr. Alexander will be accompanied by Mr. Gleason during all of these meetings. Thus, Mr. Alexander needs permission to travel to the Eastern District of Louisiana, Southern District of Mississippi, and all points in between, during the period from May 30 through June 1, 2021, and to travel to the Middle and Southern Districts of Florida during the period from June 1 through June 8, 2021.

Finally, Mr. Alexander intends to fly to Las Vegas on June 24, 2021 to attend meetings relating to a potential business opportunity and meet with various individuals in connection with preparing his defense in SEC v. Alexander. Mr. Alexander will be accompanied by Mr. Gleason during all of these meetings. Also, while in Las Vegas, Mr. Alexander intends to visit with his son. Mr. Alexander then intends to fly from Las Vegas to Los Angeles on June 27, 2021 to meet with his eye doctor for his keratoconus, attend meetings relating to a potential business opportunity, and meet with other individuals in connection with preparing his defense in SEC v. Alexander. Again, Mr. Alexander will be accompanied by Mr. Gleason during all meetings in Los Angeles in connection with preparation of Mr. Alexander's defense in SEC v. Alexander. Accordingly, Mr. Alexander needs permission to travel to the Central District of California and the District of Nevada during the period from June 24 through July 1, 2021.

On behalf of Mr. Alexander, I thank the Court for its consideration of this request.

Respectfully submitted,
/s
Brian A. Jacobs

cc: Assistant U.S. Attorney Elisha Kobre (by ECF and Email)
Assistant U.S. Attorney Margaret Graham (by ECF and Email)
Courtney M. DeFeo, U.S. Pretrial Services Office, Southern District of New York (by Email)

The application is

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granted.

Andrew L. Carter Jr, U.S.D.J.

Dated: May 20, 2021

NY, New York